

DOCKET FILE COPY ORIGINAL **RECEIVED**  
JUN 17 1994  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

**TESTIMONY OF KAREN HILL-SCOTT, ED.D**  
**FCC EN BANC HEARING ON CHILDREN'S TELEVISION**  
**MM DOCKET NO. 93-48**  
**JUNE 28, 1994**

No. of Copies rec'd  
List ABCDE

278

SUMMARY OF TESTIMONY OF  
KAREN HILL-SCOTT, ED.D  
JUNE 15, 1994

As an educator and consultant to NBC for the 1994 children's television schedule, my testimony broadly addresses two issues. First is defining educational and informational programming for children. Second, is describing an organizational process for assuring that the content of children's programming can meet the educational criteria. The main points in this testimony are that:

- breadth in the definition of what is considered educational and informational remains important;
- broadcasters and the creative community genuinely need to have some flexibility in determining how to present educational and informational content, and in what format;
- broadcasters need to apply their creativity to the development of processes which assure fidelity to the intent of the Children's Television Act (CTA);
- broadcasters need to substantially and clearly illustrate how programming intended to qualify under the CTA does, in fact, meet that station's criteria for educational and informational programming.

If taken seriously, the Act should signal a change in the way some children's television is produced. Each broadcaster planning to behave in accordance with the intent of the Act ought to articulate a definition of educational and informational programming and implement a companion production process to achieve the goals of its expanded mission.

Last Fall, 1993, I began working with NBC to develop such a process for their children's programming efforts. Two of its regularly scheduled standard length programs, Saved By The Bell,

and California Dreams, in addition to Name Your Adventure, are slated to qualify under the Act. My work has been to develop a definition of educational and informational programming which would guide creative personnel in their work. Secondly, I am also responsible for implementing a review process which follows every show from its concept to final tape.

The definition which is being applied to these three shows contains several elements, including that the content of the show be developmentally appropriate, that the educational information be integral to the plot of the episode and that the episode should take the viewer's understanding from one level to another. Examples of how this definition is operationalized are presented in the body of the testimony.

However, the more substantial work is in translating this definition into the substance of programming. The process underway at NBC includes an orientation for writers and producers regarding the educational mission and the level of effort it will take to achieve certain goals. Second, each concept is reviewed before development into script form. Each iteration of the script is reviewed for content and meaning and modified. Finally, companion materials will be written for each episode which articulate the educational goal and how the goal is developed in the story. The result of this process should produce greater clarity and make

explicit the educational and information purposes within each episode of the series. The network also expects the entertainment value will not be compromised by the expanded educational mission and the augmented production process in each of these series. Ultimately, producing better quality and more informational children's television will be the result of collaboration and exchange between the child development and the television producing communities. This will be a far superior method for meeting educational goals than other approaches which may be under consideration, including a government-imposed definition of what is "educational."

**TESTIMONY OF KAREN-HILL SCOTT, ED.D.**

**LOS ANGELES, CALIFORNIA**

**JUNE 15, 1994**

I am Dr. Karen Hill-Scott, testifying today as an independent consultant to NBC. My academic training is in child development, and my professional experience in the field goes back almost thirty years, beginning as a teacher in the first Head Start program in Los Angeles County. While my testimony has a specific focus on definition and compliance issues, my perspective in this hearing is shaped by several broad influences. As a child development specialist, I am committed to advancing the priorities of children in both public policy and service delivery. I am a practitioner who founded a large child development agency 15 years ago, and have contact with thousands of real parents and their children trying to make a go of it in very difficult times. I am a professional who has worked over the past ten years with both public television and commercial television producers on challenging and difficult program concepts. This combination of background and experience gives me a perspective on the issues which balances the practical realities of changing how an industry does its work against my need as an advocate to create changes which improve the lives of children.

The Commission has requested comments on the definition of informational and educational programming. The Children's Television Act very broadly defined educational and informational programming as that "which furthers the positive development of the

child in any respect, including serving the child's cognitive/intellectual or social/emotional needs" FCC Children's Report and Order, 6 FCC Rcd 2111, 21114 (1991). This language demonstrated a clear desire on the part of the Congress to permit the broadcasters flexibility and creativity in meeting these educational goals. The absence of specificity in the language of the Act and the data from the limited number of license applications surveyed thus far, conversely suggests that translating the Congressional intent into practice may need both guidance and support.

Last May 1993 in The Los Angeles Times, Margaret Loesch, representing the Fox Network, made the statement "we are not teachers or educators; we're in the entertainment business." From an advocate's position, it is easy to be both dismissive and critical of this position as simply shirking an ethical responsibility to rise above and/or risk going beyond proven commercial product.

In practice, however, Ms. Loesch's one-liner belies the complex challenge which is presented by transforming commercial programming into educational programming. Most of the history of broadcast television is built around the nexus of commerce and entertainment, not a nexus between communication and learning. The Children's Television Act, if taken seriously, does not mean that a broadcaster can simply add or modify a few procedures. It signals a fundamental change in the way some children's television is produced.

Meeting this challenge is not as simple as a government bureaucracy stating such programming should exist, nor is it as simple as implementing a directive from the Commission, such as the successful limits on advertising. Creating educational and informational television requires a shared understanding of what educational and informational means, a plan for what would work in a given broadcast area, and a production process that involves broadcast management, producers, writers and childhood educators.

To attain successful implementation of the letter and spirit of the Act, it is far more important that broadcasters develop approaches that merge the creative process with the educative process than it is for the government to promulgate unilateral rules which may be infeasible to implement in every broadcast market. It was certainly not the intent of the Act to replace lowest common denominator entertainment programming with lowest common denominator educational programming. Audience retention is just as important as audience education and it takes the creative side of television to attract audience, while it may take assistance from the child development community to infuse that programming with educational content.

This brings me to a description of the process developed this season by NBC, which intends for its regularly scheduled standard length programs, including Saved By the Bell, California Dreams and Name Your Adventure, to qualify under the Act. NBC has retained me to help develop and implement this process. Before production of either show could begin, it was important for the network to have

a sense of what would qualify as educational and informational programming. Definition came first. Then a monitoring and review process was put in place so the shows would have continuous input to assure that the educational/informational message was adequately presented in each episode.

#### **THE DEFINITION OF EDUCATIONAL/INFORMATIONAL**

With regard to the definition I would like to assert that breadth in the definition of what is considered educational and informational is crucial. There has been some criticism of including social/emotional content under the education rubric because it fosters the claiming of programming with somewhat specious content. However, in every large urban market in this country, developing social competence, promoting inter-group tolerance, reducing racial and ethnic prejudice, mitigating ethnic and sex stereotypes, and instilling basic human dignity are very important keys to salvaging our nation's future. We should not let cognitive content overrule the common sense dictum to educate the whole child.

Another issue on definition is establishing a primary/secondary relationship between the entertainment/education purposes. Consistent with testimony given to the Commission by the Children's Television Workshop (Docket No. 93-48, May 1993), I want to assert, unequivocally, that this is a false dichotomy. It will have a chilling effect on the creativity which is absolutely essential to making the educational process engaging to all kinds of children.

Let us not forget that educators all over the country are desperately looking for ways to push the envelope of schooling to reach disaffected learners, communicate with newcomers to this country, challenge brilliant kids, and prepare a future workforce. Pedantics alone are not the answer in the classroom, and they won't be effective in reaching an audience on television, either. We should seek a balance and an integration of education or informational content within the entertainment vehicle. This is a more difficult goal to achieve than separating the two. But with a process of review and collaboration, it can be attained, and program quality overall will be substantially enhanced. There are several notable examples in recent television history, Sesame Street being the most frequently cited, which the Commission could identify for illustrative purposes. It would be particularly useful to identify programs with educational content which have had commercial success.

Returning to the case of NBC, two of the selected shows (Bell and Dreams) are comedies with a complete storyline per episode. They lend themselves to demonstrating process as well as to dispensing facts. Before we began working on the series, I put forth a definition of educational and informational programming which would guide creative personnel in their work. The definition which is being applied to these three shows contains the following elements:

- **The show should define its audience.**

In this case the target audience is younger teens, ages

11-16. The target audience could be any age group or multiple age groups, but once defined, all the other attributes of the program apply to all the age groups defined as audience.

■ The content of the show should be developmentally appropriate for the audience which is defined.

A mystery on insurance fraud is completely inappropriate for young children, for example, who have no idea how insurance works or what fraud is. A story about the necessity of laws to preserve social order would be very effective for several age groups, depending upon the method of presentation.

■ The content should have intrinsic appeal and value to children in the targeted age group(s), and/or

■ The content should contain information which adults regard as important for children in the targeted age group(s) to know.

It is an axiom in education to introduce new concepts in a way that intersects with the child's own interests. The point here is to identify topics of importance to the target audience and develop content around these topics. The alternate approach is to consider topics adults regard as important for this age group to comprehend and internalize, like learning to manage multiple priorities, and develop that content as well.

■ The content may fall into several categories -- social, informational, emotional or intellectual -- but it must be integral to the plot and present throughout the script.

Wrap-arounds, tags, intermittent references to the educational

topic do not make for educational content. The plot must be the basis for introducing the educational content. The topics could be as wide ranging as how to prepare for college entrance exams, to resolving inter-personal conflicts, but the story must lead and sustain this content area.

■ The content should be handled in a way which is appropriate to the program format (drama, comedy, reality, documentary).

In Bell and Dreams, the content is developed over each half-hour of programming, and tends to demonstrate problem solving, decision-making, or a learning process. In contrast, Name Your Adventure, which is reality based, intersperses lots of facts, with questions and answers from the participant. Another format, interstitials, lends itself to dispensing facts, promoting simple behavioral practices, and adopting lifestyle slogans.

■ The content should avoid stereotypes of males, females, racial, religious or other significant groups.

Unfortunately, stereotypes create such fertile fodder for humor, creative personnel discount the severe and persistent negative images they sustain in the audience reaction. There are some techniques for managing stereotypic impressions on the audience, but the best approach is to not perpetuate them.

■ The content should be presented in a comprehensible, consistent manner.

■ The content should be accurate (when factual), and faithful to the character (when based on personalities).

Both these criteria can be construed by creative personnel as interfering with creative judgment about dialogue and characterization. However, if the presentation is one the audience is likely to perceive as inconceivable, incomprehensible, or implausible, the message will be lost.

■ The content should take the viewer from one level of knowledge to a more informed or higher level of knowledge by the end of the episode.

The heart of becoming educated about something is to have acquired new knowledge, or to have built upon existing knowledge. Although in mass communication, taking baseline measurements of audience knowledge is not feasible, there is still the potential to move the general content of an episode from one state of understanding to another. When the target audience is teens, in particular, reasoning, problem solving, and developing good judgment are essential preparatory skills for adulthood. Thus, increasing knowledge along a continuum is more important than dispensing facts.

There are several aspects of the above definition which differ from some of the language being proposed as model for a government specified definition of educational and informational programming. First is the issue of audience definition. Rather than requiring broadcasters to identify a specific age category, this definition permits broadcasters to direct programming to a multi-age audience with the understanding that multi-age programming is a decidedly more difficult undertaking. Multi-age programming must be designed

so that all ages will comprehend most of the content most of the time -- not that some of the ages might comprehend some of the material some of the time. Over forty years of research on human learning has made it quite clear that a five year old does not process information or comprehend content in the same way as a twelve year old. But without multi-age programming, we won't have "family" programming that a group of siblings could comfortably watch together.

Flexibility in format is another key difference between this definition and others being proposed. While there is no doubt that more programming minutes at regularly scheduled times are provided through "core" programming, excluding interstitials from a possible formula would be a mistake. For three years, NBC ran "One To Grow On," child focussed interstitials that aired like clockwork on Saturday mornings. They conveyed the kinds of messages or "rules for living" that could bear repetition, didn't require plot development, and took 60 seconds of air time during the periods children were very likely to be watching television. These interstitials won awards from Action for Children's Television, The Council for Better Broadcasting, and an EMMY. Furthermore, the network received letters from parents of young children who had learned some crucial principles of personal safety from the "drop-ins."

Finally, the definition being used at NBC emphasizes making the educational or informational content integral to the plot of the story rather than designating it as a separate message. The

essential challenge of education is to get children to recognize that what they learn really is relevant to living and functioning in the world as a competent individual. This attempt to render the informational content inseparable from the entertainment concretely illustrates the principle that learning enhances living.

### THE PROCESS

Getting the definition of the programming clarified was just one step in the process. The more substantial and most important work is in translating the above definition into the substance of programming. The approach which is underway at NBC has six elements. They are described as follows:

#### ■ REVIEW OF PROSPECTIVE PROGRAMMING

Once management had made the decision to qualify the entire schedule, I was asked to review tapes of the programming under consideration and meet with the creative staff of each show. The purpose was to determine if the show was conceptually or inherently amendable to conveying educational and informational content and if the creative staff was responsive to this mission.

#### ■ ORIENTATION WITH CREATIVE TEAM

Once the schedule had been selected, network management had me meet with the creative teams to go over the intent of the Act and to discuss ways their shows could meet the educational and informational standard. The creative team, in turn, proposed a feedback loop for processing scripts and revisions so the actual review process could begin.

■ **STORY CONFERENCES AND REVIEWS OF PROPOSED TREATMENTS**

Each script emanated from an abbreviated treatment which was discussed thoroughly to determine if the plotline conveyed an educational or informational message, what were the most effective ways of conveying that message within the proposed story, what additional research might be needed to verify factual information or to obtain additional information, and to comment on the inherent attractiveness and appropriateness of the story for the target audience.

■ **SCRIPT DEVELOPMENT AND REVIEW**

I provide written notes and verbal feedback on each draft of the script until it reaches a point of mutual satisfaction. This is, quite frankly, a process of compromise and debate, where communication is essential to understanding the needs of the creative team to execute a concept and my need to make a point.

■ **REVIEW OF ROUGH CUTS**

After the taping, I give a summary note on how well the final product ultimately reflects the educational intent of the episode.

■ **ARTICULATION OF COMPANION MATERIALS**

The companion materials for each episode provide a written articulation of the goal/or message and examples of how the message is illustrated in the story. The result of this process is to produce clarity and explicitness of the educational and information purposes within each episode of the series. These materials may also later be used as a basis for any study guides or other public information pieces the network may produce when the season is

inaugurated.

### CONCLUSION

The network expectation from this process is that the content of both shows will have more depth and meaning for their target audience. Furthermore, the entertainment value will not be compromised by the expanded educational mission and the augmented production process adopted this season. What the network believes about this programming process is not that different from what children's television advocates intended. That is, the broadcast and creative community will be able to generate high quality, high content programming for the for the child audience. Moreover, the programming will have the production values essential to attracting an audience.

What the network knows from this recent experience -- which is probably overlooked by external groups -- are these four additional things. There is a challenging process of organizational change that must take place to produce qualifying programming. There are new or additional players at the creative table who are necessary collaborators for integrating educational content into commercial television for children. There is a learning curve to merging the educational and entertainment purposes effectively. There is the capacity and the will to do this within major segments of the broadcast and creative community without the restrictive government dictates that create a negative and resistant climate.

As a child development advocate and consultant to the network, I recognize that the process which I have just described is really

the outcome of consistent external pressure on the Congress to pass the Children's Television Act and on the FCC to oversee its implementation. Given the large number of broadcasters, and the wide diversity in markets, it seems less prudent to create inflexible rules which may have as the only major negative consequences closer scrutiny of the licensing application. The far stronger course would be to generate guidelines which reiterate the intent of the Act, which call for the broadcaster to define their process for meeting the intent of the Act, which instruct and illustrate several ways of meeting that intent, but which put the burden of proof on the broadcaster. There are no doubt broadcasters out there who are resistant, difficult, stubborn, and uninterested in fulfilling a children's agenda. But there are no doubt others who will engage the community of scholars and specialists in child development in a collaborative process to produce better, informational and educational television for children. We need find ways to stimulate and initiate that process rather than invent rules which serve to circumscribe communication and exchange.

**KAREN HILL-SCOTT, Ed.d.**

Dr. Karen Hill-Scott is a nationally recognized expert in child development and children's television programming. She is co-founder of Crystal Stairs, the largest private child development organization in California, Adjunct Professor of Planning at UCLA, and President of her own consulting firm.

Hill-Scott has been involved with children's and family television for the past ten years and has consulted on over 500 episodes of series television, afterschool programs, and family specials. Several of these series have won awards from Action for Children's Television, the Council for Better Broadcasting, and selected episodes have won the Humanitas Award. She also developed over 100 interstitial programming segments ("One to Grow On") for NBC which won an EMMY in 1987. As a member of the NBC Social Science Advisory Panel from 1984-1992, she reviewed all development proposals for children's programming submitted to the network.

In addition to network consulting, Hill-Scott has worked with independent production companies on development packages. She is currently senior educational advisor for The Puzzleworks, the first new Corporation for Public Broadcasting funded series for pre-school children funded by the Corporation for Public Broadcasting in 25 years. Hill-Scott is also a programming consultant for the new cable World Africa Network.

In the area of child development, Hill-Scott created an organization that serves over 12,000 California children and families in a variety of child care and child nutrition programs. She is a nationally recognized authority on prototype service delivery systems and child care supply and demand. Hill-Scott is involved in major policy developments regarding children in the United States and has been asked to appear as a witness for several Congressional hearings on child care, welfare reform, and child nutrition legislation.

Over the past 20 years, Hill-Scott has written and lectured extensively about child development issues. She works with private corporations and organizations in designing work-family programs and her current client roster is diverse, including TRW Space & Defense as well as Kaufman & Broad, the largest California homebuilder. For public service, Hill-Scott has served on or chaired several national, state, and local commissions and boards. Currently, in addition to her participation on the Board of Rebuild LA and the Los Angeles Child Care Advisory Board, Hill-Scott is Chair of the Economic Justice Initiative Project of the Los Angeles Women's Foundation.

Dr. Hill-Scott received her B.A. in Music from Pepperdine University and her doctorate in Learning and Development from UCLA where she has been on the faculty since 1972. She is married with four children and resides in Los Angeles.